



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAEKUN CHO,
aka "DK,"

Defendant.

CR No. 23-149(A)-FLA

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. § 1951(a): Interference and Attempted Interference with Commerce by Extortion; 18 U.S.C. § 2119(2): Carjacking; 18 U.S.C. §§ 981(a)(1)(C), 982, 924; and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNTS ONE AND TWO

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim Y.S., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future,

to Victim Y.S. and Victim Y.S.'s business:

COUNT	DATE	AMOUNT
ONE	November 16, 2020	\$100
TWO	December 19, 2020	\$100

COUNTS THREE AND FOUR

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim J.L., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim J.L. and Victim J.L.'s business:

COUNT	DATE	AMOUNT
THREE	January 12, 2021	\$100
FOUR	February 15, 2021	\$100

COUNTS FIVE THROUGH THIRTY-TWO

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim S.S., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim S.S. and Victim S.S.'s business:

COUNT	DATE	AMOUNT
FIVE	December 17, 2020	\$100
SIX	January 17, 2021	\$100
SEVEN	February 15, 2021	\$100
EIGHT	March 16, 2021	\$100
NINE	April 15, 2021	\$200
TEN	May 14, 2021	\$200
ELEVEN	June 15, 2021	\$300
TWELVE	July 16, 2021	\$300
THIRTEEN	August 15, 2021	\$300
FOURTEEN	September 16, 2021	\$300
FIFTEEN	October 16, 2021	\$400
SIXTEEN	November 18, 2021	\$400
SEVENTEEN	December 18, 2021	\$500
EIGHTEEN	January 15, 2022	\$520
NINETEEN	February 15, 2022	\$500
TWENTY	March 17, 2022	\$500

COUNT	DATE	AMOUNT
TWENTY-ONE	April 16, 2022	\$500
TWENTY-TWO	May 15, 2022	\$400
TWENTY-THREE	June 20, 2022	\$400
TWENTY-FOUR	July 14, 2022	\$400
TWENTY-FIVE	August 16, 2022	\$400
TWENTY-SIX	September 16, 2022	\$500
TWENTY-SEVEN	October 19, 2022	\$700
TWENTY-EIGHT	November 15, 2022	\$500
TWENTY-NINE	December 16, 2022	\$500
THIRTY	January 15, 2023	\$500
THIRTY-ONE	January 25, 2023	\$400
THIRTY-TWO	March 16, 2023	\$500

COUNTS THIRTY-THREE THROUGH THIRTY-NINE

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim K.Y.J., a manager of a karaoke bar, by means of threatened force, violence, and fear of injury, immediate and future, to Victim K.Y.J. and Victim K.Y.J.'s business:

COUNT	DATE	AMOUNT
THIRTY-THREE	December 7, 2020	\$600
THIRTY-FOUR	January 7, 2021	\$600
THIRTY-FIVE	February 1, 2021	\$600
THIRTY-SIX	March 6, 2021	\$600
THIRTY-SEVEN	April 10, 2021	\$600
THIRTY-EIGHT	April 23, 2021	\$400
THIRTY-NINE	May 5, 2021	\$600

COUNTS FORTY THROUGH FIFTY-FIVE

[18 U.S.C. § 1951(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, obstructed, delayed, and affected interstate commerce by committing extortion, in that defendant CHO obtained property, consisting of money from Victim Y.K., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim Y.K. and Victim Y.K.'s business:

COUNT	DATE	AMOUNT
FORTY	March 1, 2022	\$1,000
FORTY-ONE	April 15, 2022	\$200
FORTY-TWO	June 5, 2022	\$200
FORTY-THREE	June 20, 2022	\$200
FORTY-FOUR	July 14, 2022	\$200
FORTY-FIVE	July 25, 2022	\$500
FORTY-SIX	August 15, 2022	\$200
FORTY-SEVEN	September 15, 2022	\$200
FORTY-EIGHT	October 15, 2022	\$200
FORTY-NINE	October 19, 2022	\$200
FIFTY	November 15, 2022	\$200
FIFTY-ONE	December 15, 2022	\$200
FIFTY-TWO	January 14, 2023	\$200
FIFTY-THREE	January 16, 2023	\$200
FIFTY-FOUR	February 16, 2023	\$400
FIFTY-FIVE	March 15, 2023	\$400

COUNT FIFTY-SIX

[18 U.S.C. § 1951(a)]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," knowingly and with intent to obtain property, attempted to obstruct, delay, and affect interstate commerce by committing extortion, in that defendant CHO attempted to obtain property, consisting of \$500 from Victim S.S., a manager of hostesses catering to karaoke bars, by means of threatened force, violence, and fear of injury, immediate and future, to Victim S.S. and Victim S.S.'s business.

COUNT FIFTY-SEVEN

[18 U.S.C. §§ 2119(2), 2(a)]

On or about May 8, 2021, in Los Angeles County, within the Central District of California, defendant DAEKUN CHO, also known as "DK," and others known and unknown to the Grand Jury, each aiding and abetting the others, with the intent to cause death and serious bodily harm, knowingly and intentionally took a motor vehicle, namely, a Honda Odyssey minivan, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of another, namely, Victim Y.S., by force and violence and by intimidation, resulting in serious bodily injury.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in any of Counts One through Fifty-Six of this First Superseding Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to any of the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. §§ 982 and 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Sections 982 and 924, and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in Count Fifty-Seven of this First Superseding Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violation;

(b) All right, title, and interest in any firearm or ammunition involved in or used in such offense, and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the

jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/s/
Foreperson

E. MARTIN ESTRADA
United States Attorney



MACK E. JENKINS
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Chief, Criminal Division

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